

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Competitive Product Prices  
International Priority Airmail, Commercial ePacket  
Priority Mail Express International, Priority Mail  
International & First-Class Package International  
Service Contract 5 (MC2020-166)  
Negotiated Service Agreements

Docket No. CP2020-189

PUBLIC REPRESENTATIVE COMMENTS ON NOTICE OF  
POSTAL SERVICE FILING MODIFICATION TWO TO  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL INTERNATIONAL,  
& FIRST-CLASS PACKAGE INTERNATIONAL SERVICE CONTRACT 5

(December 22, 2020)

The Public Representative hereby provides comments pursuant to the Commission's Notice in this docket.<sup>1</sup> In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of Filing of Modification Two to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 5.<sup>2</sup>

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<sup>1</sup> PRC Notice Initiating Docket No. CP2020-189, December 17, 2020

<sup>2</sup> Notice of the United States Postal Service of Filing Modification Two to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 5. December 16, 2020. (Notice).

The Postal Service's Notice includes a certified statement as required by 39 C.F.R. § 3035.105(c)(2), a public (redacted) version of Modification Two to Contract 5, and supporting financial data estimating the contract value during the first year.

In Order No. 5569, the Commission approved the Postal Service's request to add a new product identified as International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 5 to the Competitive Product List.<sup>3</sup> The instant Modification revises Articles 2,3,7,8,13,and 15 of the Agreement, changes Article 13 so that the Agreement will remain in effect until February 28, 2023, and adds Annexes 1B, 2B, 3A, 4A,5B and 6A to the Agreement.. *Attachment A, at 1-2.*

## COMMENTS

The Public Representative has reviewed the Postal Service's Notice of Modification to International Priority Airmail, Priority Mail Express International, Commercial ePacket, Priority Mail International, First-Class Package International Service Contract 5 and the financial data filed under seal with the Postal Service's Notice. Based upon that review, the Public Representative concludes that Contract 5 , as modified, should continue to generate sufficient revenues to cover costs and thereby satisfy 39 U.S.C. § 3633(a) and thus should be approved by the Commission.

Finally, the Postal Service must file revenue and cost data for Contract 5 in future Annual Compliance Reports. This data will permit the Commission to annually review the financial results for Contract 5 for compliance with 39 U.S.C. § 3633(a).

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<sup>3</sup> See Order No. 5569 Order Adding International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 5 to the Competitive Product List, Docket No. MC2020-166 and CP2020-189, June 29, 2020.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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